

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:	:	CHAPTER 7
	:	
WORLEY & OBETZ, INC., <i>et al.</i> ,	:	Case No. 18-13774 (MDC)
	:	(Jointly Administered)
Debtors	:	
	:	
CHRISTINE C. SHUBERT, Chapter 7	:	
Trustee for the Estates of Worley & Obetz,	:	
Inc., <i>et al.</i> ,	:	Adv. No. 18-00235 (MDC)
	:	
Plaintiff	:	
	:	
vs.	:	
	:	
ROBERT SETH OBETZ, an individual;	:	
ROBERT W. OBETZ, JR., an individual;	:	
JEFFREY B. LYONS, an individual;	:	
JUDITH A. AVILEZ, an individual;	:	
KAREN L. CONNELLY, an individual;	:	
MARJORIE S. OBETZ, an individual;	:	
MELISSA OBETZ, an individual;	:	
JULIE LYONS, an individual;	:	
MOLLY S. OBETZ, an individual;	:	
SAMUEL J. OBETZ, an individual;	:	
HOWARD W. CRAMER, JR., an individual;	:	
KATHLEEN A. CRAMER, an individual;	:	
MICHELE K. KLUSEWITZ, a/k/a	:	
MICHELE KELLY, an individual;	:	
149 DOE RUN ROAD, LP, a Pennsylvania	:	
limited partnership;	:	
149 DOE RUN ROAD, GP, LLC, a	:	
Pennsylvania limited liability company;	:	
202 GREENFIELD, LP, a Pennsylvania	:	
Limited partnership;	:	
202 GREENFIELD GENERAL, LLC, a	:	
Pennsylvania limited liability company;	:	
535 STIEGEL VALLEY ROAD, LLC, a	:	
Pennsylvania limited liability company;	:	
DOE RUN ROAD, LLC, a Pennsylvania	:	
limited liability company;	:	
OL PARTNERS, LLC, a Pennsylvania	:	
limited liability company;	:	
G-FORCE SPORTFISHING, INC., a	:	
Delaware corporation;	:	
JW BISHOP PROPERTIES, LLC, a	:	
Pennsylvania limited liability company;	:	

LYONS & OBETZ, a Pennsylvania :  
general partnership: :  
JSB RETENTION, LLC, a Pennsylvania :  
Limited liability company; :  
SETH ENERGY, LLC, a Pennsylvania :  
Limited liability company; :  
SHIPLEY ENERGY COMPANY, a :  
Pennsylvania corporation; :  
:  
Defendants :

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**LIMITED OBJECTION OF DOE RUN REALTY PARTNERS, LP TO  
CHAPTER 7 TRUSTEE'S MOTION FOR AN ORDER APPROVING SETTLEMENT  
AGREEMENT BY AND AMONG THE CHAPTER 7 TRUSTEE AND DEFENDANTS**

Doe Run Realty Partners, LP ("DRRPLP"), a Pennsylvania limited partnership and party in interest in the underlying bankruptcy proceeding, by and through its undersigned counsel, files this Limited Objection to the Trustee's Motion for an Order Approving Settlement Agreement by and Among the Chapter 7 Trustee and Defendants ("Motion") on the following basis:

1. DRRPLP was formed to acquire, develop and construct certain commercial real estate in Manheim Township, Lancaster County, Pennsylvania (the "Property").

2. DRRPLP's sole general partner is Doe Run Realty Partners GP, LLC, a Pennsylvania limited liability company ("DRRPGPLLC"), owner of a 1% partnership interest in DRRPLP.

3. DRRPLP's two limited partners are Doe Run Holdings, LP, a Pennsylvania limited partnership ("DRHLP") and OL Partners, LLC, a Pennsylvania limited liability company ("OLPLLC"). DRHLP and OLPLLC each own a 49.5% partnership interest in DRRPLP.

4. OLPLLC and Doe Run Holdings GP, LLC, a Pennsylvania limited liability company ("DRHGPLLC"), each own a 50% membership interest in DRRPLP's general partner DRRPGPLLC.

5. DRRPLP is the borrower on a credit facility extended by Fulton Bank in the original principal amount of \$1,237,500.00 (the "Loan") to finance improvements upon the Property. DRRPGPLLC, DRHLP and OLPLLC are guarantors of the indebtedness of DRRPLP under the Loan.

6. DRRPLP does not object generally to the settlement proposed in the Motion and set forth more fully in the Settlement Agreement attached thereto ("Settlement Agreement"), but rather lodges this Limited Objection solely to object to the extent that the parties to the settlement intend for the transfer of the interests of Robert Seth Obetz and Jeffrey B. Lyons in OLPLLC described in Sections 7 and 8 of the Settlement Agreement or the Trustee's subsequent auction of those interests to be free and clear of any rights or interests of DRRPLP and/or its general or limited partners (or the equity owners of such general or limited partners), under the formation and governing documents pertaining to those entities, applicable law or otherwise, including without limitation any rights of DRRPLP and/or its general or limited partners (or the equity owners of such general or limited partners) to oppose transfer of ownership and control of OLPLLC.

7. DRRPLP reserves its right to assert at or prior to the hearing upon the Motion such other and further objections as may be appropriate.

BRUBAKER CONNAUGHTON GOSS  
& LUCARELLI LLC  
Attorneys for Doe Run Realty Partners, LP

Dated: November 18, 2020

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